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8 *Attorney for Defendant, Liberty Stock Transfer, Inc. a New Jersey corporation*

6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

9 DAVID WELLS, an individual and California
10 resident,

11 Plaintiff,

12 vs.

13 GLOBAL TECH INDUSTRIES, INC., A
14 NEVADA CORPORATION; AND LIBERTY
15 STOCK TRANSFER, INC., A NEW JERSEY
16 CORPORATION; DOES 1 THROUGH 10,
17 INCLUSIVE; ROE BUSINESS ENTITIES, 1
18 THROUGH, INCLUSIVE,

19 Defendants.

Case No.: 2:21-cv-02040-GMN-NJK

20 **STIPULATION AND ORDER TO
21 EXTEND TIME TO RESPOND TO
22 COMPLAINT [ECF No. 1]**

23 **(SECOND REQUEST)**

24 Plaintiff, David Wells ("Plaintiff"), and Defendant, Liberty Stock Transfer, Inc. a New Jersey
25 corporation. ("Liberty"), by and through their respective attorneys of records, hereby stipulate and agree
26 as follows:

- 27 1. On November 11, 2021, Plaintiff filed his Complaint in United States District Court, District of
28 Nevada, Case No. 2:21-cv-02040-GMN-NJK [ECF No. 1].
2. Liberty was served with Plaintiff's Complaint on November 16, 2021 [ECF No. 8].
3. The deadline for Liberty to respond to Plaintiff's Complaint was December 7, 2021.
4. Liberty filed an Amended 1st Request for Stipulation and Order to Extend Time to Respond to
Complaint on December 8, 2021.
5. The court entered an Order Granting said Stipulation and Order extending the deadline for
Liberty to respond to Complaint until December 21, 2021.
6. Liberty is once again requesting a brief 2-week extension until January 4, 2022, to file its
response to Plaintiff's Complaint.

7. This second extension is requested due to Liberty and undersigned counsel being sick and out of the office along with the current holiday season necessitating the additional time to review and respond to the factual allegations and statutes cited to in the Complaint.
8. Counsel for Plaintiff does not oppose this second requested extension.
9. This is the second request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

<p>DATED this 20th day of December, 2021.</p> <p>WRIGHT, FINLAY & ZAK, LLP</p> <p><u>/s/ Rock K. Jung, Esq.</u> Rock Jung, Esq. Nevada Bar No. 10906 7785 W. Sahara Avenue, Suite 200 Las Vegas, Nevada 89117 (702) 475-7964; Fax: (702) 946-1345 rjung@wrightlegal.net Attorneys for Defendant, Liberty Stock Transfer, Inc. a New Jersey corporation</p>	<p>DATED this 20th day of December, 2021.</p> <p>ENENSTEIN PHAM & GLASS, LLP</p> <p><u>/s/ Teri T. Pham</u> Robert A. Rabbat, Esq. Nevada Bar No. 12633 11920 Southern Highlands Pkwy., Suite 103 Las Vegas, Nevada 89141 rrabbat@enensteinlaw.com Teri T. Pham, Esq. (<i>Pro Hac Vice</i>) 12121 Wilshire Boulevard, Suite 600 Los Angeles, CA 90025 tpham@enensteinlaw.com Attorneys for Plaintiff, David Wells</p>
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ORDER

IT IS SO ORDERED.

Dated: December 21, 2021



United States Magistrate Judge